

Appendix A

APPENDIX A**Outstanding Rule 30(b)(6) Topics, Noticed by the States to Google on February 21, 2024:**

TOPIC No./Nos. (*Pending before Special Master)	Date(s)	Start Time	Witness	Location
Topic 66			<i>Neal Mohan,</i> [REDACTED] <i>per</i> <i>Paul Yettter</i> <i>4/18/24</i>	
*Topics 1, 2, 3, 4, and 16				
Topic 6				
*Topics 17-19				
Topic 22				
Topics 29 – 30				
*Topic 36				
Topics 40-42, 44, 51- 52:				
Topic 45				
Topic 55				
Topic 65				
Topic 74				
Topics 75 and 76				
Topic 83, Topic 104(f), 104(i), 104(q)				
Topic 104(c)				
Topic 104 (e), (j), (k), (n) (q)				
Topics 105-106				

Noticed Google Witnesses under Rule 30(b)(1) with No Deposition Dates Offered:¹

1. Sergey Brin*²
2. Sundar Pichai*
3. Neal Mohan*
4. [REDACTED]*
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]
8. [REDACTED]
9. [REDACTED]
10. [REDACTED]
11. [REDACTED]

¹ The States have also, pursuant to representations from Google's counsel, subpoenaed three former Google employees whom Google's counsel claims to not represent: [REDACTED], [REDACTED], and [REDACTED]. The States are assessing whether to withdraw or move forward with those subpoenaed depositions and will update immediately if they are withdrawn. Google has this week also advised that another noticed deponent, [REDACTED], must also be subpoenaed, and the States are awaiting receiving her last known contact information.

² Asterisked noticed deponents reflect the four witnesses, whose depositions Google has moved for a protective order before the Special Master. At the Special Master hearing (with respect to Ms. [REDACTED]) and in follow-up correspondence (regarding the others), the States have proposed to take only 3-4 hours for each of these depositions.

Subpoenaed Third Parties under Rule 30(b)(6) with No Deposition Dates Confirmed:³

1. American Express Company
2. Broadstreet Ads, Inc.
3. Criteo Corp.
4. DallasNews Corporation
5. Dentsu Holdings USA, Inc.
6. Eileen Fisher, Inc.
7. Equativ
8. General Motors Company
9. Index Exchange
10. Kohl's Corporation
11. Magnite, Inc.
12. Microsoft Corporation
13. NIKE, Inc.
14. OpenX Software Ltd
15. PreBid.org Inc.
16. Pubmatic, Inc.
17. Taboola, Inc.
18. Texas Monthly LLC
19. Trade Desk
20. Walmart Inc
21. Yahoo Inc.

³ As Rule 30(b)(6) depositions, these depositions will not each count as one deposition if the States only take a few hours with each witness, as is the States' intent. Also, as stated in the States' brief, the States are assessing whether they will withdraw any third-party subpoenaed depositions (just as Google has withdrawn third-party subpoenas) and expect to make those decisions soon.

Scheduled Rule 30(b)(6) of the Plaintiff States, with All Deposition Dates Offered:

Texas	April 17 (completed)	In Person Justin Gordon 9 am CT start NRF Austin 98 San Jacinto Blvd Ste 1100 Austin, TX 78701
Florida	April 22 (completed)	In Person Andrew Butler 9:30 am ET start Collins Building 107 W Gaines St Tallahassee, FL 32399
South Carolina	April 23 (confirmed date)	Remote Rebecca Hartner 9 am ET start
Kentucky	April 25 (confirmed date)	In Person Jonathan Farmer 9 am ET start 310 Whittington Parkway Suite 101 Louisville, KY 40222

Mississippi	<p>April 25 (confirmed date)</p> <p>Crystal Secoy (30b6 topics)</p> <p>Sid Salter (MSU topics)</p>	<p>In Person</p> <p>Crystal Secoy</p> <p>9:30 am CT start</p> <p>Sid Salter</p> <p>After 1st depo start</p> <p>550 High Street</p> <p>Jackson, MS</p>
Indiana	<p>April 25-26 (confirmed dates)</p> <p>April 25 –</p> <p>Steven Taterka - Topics 1-5, 11-14, 16, 26-28</p> <p>April 26 –</p> <p>Jamie Weber - Topic 32</p>	<p>In Person</p> <p>1 pm ET start April 25</p> <p>10 am ET start April 26</p> <p>302 W Washington Street</p> <p>Indiana Gov't Center South</p> <p>Fifth Floor</p> <p>Indianapolis, IN 46204</p>
Missouri	<p>April 26 (confirmed date)</p>	<p>Remote</p> <p>Michael Schwalbert</p> <p>9 am CT start</p>
Nevada	<p>April 29 (confirmed date)</p>	<p>Remote</p> <p>Lucas Tucker</p> <p>8:30 am to 4:30 pm PT</p>
South Dakota	<p>April 29 (confirmed date)</p>	<p>In Person</p> <p>Jonathan Van Patten</p> <p>8 am CT start</p> <p>1302 E Hwy 14</p> <p>Pierre, SD 57501</p>

Utah	<p>April 30 (confirmed date)</p> <p>Marie Martin – Topics 1-3 (AGO only), 4-5 (but not DCP ad agency purchases or DCP’s doc retention policies), 11-14, 16, 26-27 (both AGO and DCP)</p> <p>Melanie Hall – Topics 1-3 (DCP), 4-5 (as they relate to DCP ad agency purchases and DCP doc retention policies), 28, 32 (DCP only)</p>	<p>Remote</p> <p>Marie Martin</p> <p>8 am PT start</p> <p>Melanie Hall</p> <p>1 pm PT start</p>
Puerto Rico	<p>April 30 (confirmed date)</p>	<p>In Person</p> <p>Guarionex Diaz Martinez</p> <p>9:30 am ET start</p> <p>PR DOJ</p> <p>Calle Teniente Cesar Gonzalez</p> <p>677 Esq Ave Jesus T Pinero</p> <p>San Juan, Puerto Rico</p>
Montana	<p>(confirmed dates)</p> <p>April 30 – Bret Taylor - Topics 1-3</p> <p>May 1 – Anna Schneider - Remaining topics</p>	<p>Remote</p> <p>Bret Taylor 9 am MT start</p> <p>Anna Scheider 9 am MT start</p>
Arkansas	<p>May 1 (confirmed date)</p>	<p>Remote</p> <p>Chuck Harder</p> <p>9 am CT start</p>
North Dakota	<p>May 2 (confirmed date)</p>	<p>Remote</p> <p>Elin Alm</p> <p>8 am CT start</p>

Idaho	May 3 (confirmed date)	Remote John Olson 9:30 am MT start
Louisiana	May 3 (confirmed date)	In Person Patrick Voelker 9 am CT start Louisiana AG office* Baton Rouge
Alaska	May 3 (confirmed date)	Remote Jeff Pickett Noon Alaska start